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Los Angeles Regional Water Quality Control Board

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Pete Wilson
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May 29, 1997

Mr. George Mileskiy
Director of Environment
JOHNSON CONTROLS, INC.
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SAN GABRIEL VALLEY CLEANUP PROGRAM - NO FURTHER REQUIREMENTS, JOHNSON CONTROLS FACILITY, 315 SOUTH SEVENTH AVENUE, CITY OF INDUSTRY, CALIFORNIA (FILE NO. 102.0058)

We are in receipt of the "Limited Soil Vapor Survey and Closure Report," received on March 11, 1997, submitted on your behalf, by your consultant AEROVIRONMENT ENVIRONMENTAL SERVICES, INC. This report includes results of collection and analysis of soil gas samples to assess several areas of concern at the subject site. This submission is in general compliance with requirements in our letter of October 23, 1996. Upon review of this report, we have the following comments:

1. During January 14, 15 and 27, 1997, a total of twenty-six (26) soil vapor samples were collected from twenty-six (26) soil gas probes installed to a maximum depth of 15' below ground surface (bgs). Laboratory analysis of these samples resulted in the detection of maximum volatile organic compounds (VOCs) concentrations of 2.8 µg/l of PCE at 15' bgs, 1.4 µg/l of 1,1-DCA at 15' bgs, 1.4 µg/l of 1,1,1-TCA at 15' bgs, and 0.6 µg/l of PCE at 15' bgs.

2. This assessment work supplements and confirms previous assessment results. These findings indicate that the shallow PCE impact detected in the northern section of the property out-side the building during March 1991 and 1993 has naturally attenuated.

PREVIOUS ASSESSMENT

The subject site has been occupied by a manufacturer of plastic beverage containers. 1,1,1-TCA was used to clean the label machinery and was detected in a sludge sample collected from the clarifier. During March 1991, a total of twenty-seven (27) soil matrix samples were collected from ten (10) boreholes drilled to a maximum depth of 10' bgs over several areas of the facility. Maximum VOCs concentrations detected were 257 µg/kg of PCE at 1' bgs, and 91 µg/kg of 1,1,1-TCA at 1' bgs. Also, up to 68 mg/kg of TRPH was detected. In addition, on March 17, 1993, a total of seventeen (17) soil gas samples were collected from fifteen (15) soil vapor probes installed in the northern section of the property out-side the building to a maximum depth of 15' bgs. The highest VOCs concentrations detected were 47.1 µg/l of PCE at 5' bgs, 30.6 µg/l of 1,1,1-TCA at 5' bgs, and 10.6 µg/l of 1,1-DCA at 5' bgs. In general, the highest VOCs concentration was detected in samples collected outside the building in the former cooling tower area

Based on the results of this report and previous information contained in the file, minor TRPH and VOCs soil contamination has resulted from releases of liquid wastes from sources on the subject site. The traces of VOCs detected in a few of the soil vapor and samples at 15' bgs indicates possible minor migration of VOCs-tainted liquid wastes to those depths from on-site sources. However, there does not appear to be a significant "track to ground water" (or VOCs-contaminated soil from ground surface to ground water) that might indicate that substantial quantities of VOCs migrated to the ground water from superficial on-site sources. The low concentrations of VOCs in the soil and soil vapor do not pose a continuing threat to ground water quality and do not warrant cleanup. Therefore, we have no further requirements with respect to vadose zone assessment and remediation at the subject site.

The jurisdictional requirements of other agencies, such as the U.S. Environmental Protection Agency (USEPA), are not affected by the Board's "no further requirements" determination. Such agencies may choose to make their own determination concerning the site. If you have any questions, please contact Julio C. Lara at (213)266-7541.

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Environmental Specialist IV

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